

Trunk Group Performance

REPORT: TRUNK GROUP SERVICE
REPORT PERIOD: 03/23/1996 - 04/24/1996

	AL	GA	KY	LA	MS	NC	NF	SC	SF	TN	REGION	TOTAL
CLEC 1												
BST ADMINISTERED												
- TOTAL TRUNK GROUPS												
- TRK GRPS MEAS/PROC												
- TOT GRPS > 3% OBSERVED BLOCKING												
CLEC 1¹ ADMINISTERED												
- TOTAL TRUNK GROUPS												
- TRK GRPS MEAS/PROC												
- TOT GRPS > 3% OBSERVED BLOCKING												
TOTAL CLEC 1¹												
- TOTAL TRUNK GROUPS												
- TRK GRPS MEAS/PROC												
- TOT GRPS > 3% OBSERVED BLOCKING												
CLEC AGGREGATE												
BST ADMINISTERED												
- TOTAL TRUNK GROUPS	13	27	0	0	1	0	17	4	10	14		115
- TRK GRPS MEAS/PROC	13	25	0	0	1	0	15	4	10	14		111
- TOT GRPS > 3% OBSERVED BLOCKING	1	2	1	0	0	0	1	0	1	2		8
CLEC ADMINISTERED												
- TOTAL TRUNK GROUPS	64	121	25	32	0	0	37	19	57	70		517
- TRK GRPS MEAS/PROC	62	106	25	31	0	0	27	19	57	70		480
- TOT GRPS > 3% OBSERVED BLOCKING	3	2	0	1	0	2	1	2	7	0		18
TOTAL CLEC AGGREGATE												
- TOTAL TRUNK GROUPS	67	148	33	39	0	0	54	23	73	82		632
- TRK GRPS MEAS/PROC	65	131	33	37	0	0	42	23	73	80		581
- TOT GRPS > 3% OBSERVED BLOCKING	4	4	1	1	0	2	2	2	8	2		28
BELLSOUTH COMMON TRANSPORT TRUNK GROUP(CTTG)												
BST ADMINISTERED												
- TOTAL TRUNK GROUPS	374	305	182	502	370	421	356	210	284	510		3541
- TRK GRPS MEAS/PROC	370	302	182	502	370	410	356	210	284	509		3531
- TOT GRPS > 2% OBSERVED BLOCKING	6	1	0	2	3	1	0	0	1	3		17
INDEPENDENT ADMINISTERED												
- TOTAL TRUNK GROUPS	109	158	53	68	72	97	39	06		100		646
- TRK GRPS MEAS/PROC	104	155	53	66	72	96	39	06		105		636
- TOT GRPS > 2% OBSERVED BLOCKING	6	5	0	0	3	2	0	3		6		26
TOTAL BELLSOUTH CTTG												
- TOTAL TRUNK GROUPS	483	463	235	568	451	518	395	304	294	616		4387
- TRK GRPS MEAS/PROC	474	457	235	568	451	515	395	304	294	614		4367
- TOT GRPS > 2% OBSERVED BLOCKING	11	6	0	2	6	3	0	3	1	11		43
BELLSOUTH LOCAL NETWORK												
BST ADMINISTERED												
- TOTAL TRUNK GROUPS	361	920	193	438	320	709	407	331	337	442		4478
- TRK GRPS MEAS/PROC	374	894	193	437	320	704	398	330	337	442		4429
- TOT GRPS > 3% OBSERVED BLOCKING	11	48	3	7	2	9	6	6	10	12		148

Note 1: CLEC 1 information will be populated & distributed on an individual CLEC basis.

EXHIBIT

tabular

1 STATE OF ALABAMA
2 ALABAMA PUBLIC SERVICE COMMISSION
3 MONTGOMERY, ALABAMA
4
5

6 IN RE: BELLSOUTH TELECOMMUNICATIONS,
7 INC.,
8

9 DOCKET NO. 25835
10

11 VOLUME III
12
13

14 TESTIMONY FROM THE PROCEEDINGS taken
15 before the Alabama Public Service Commission
16 in the above-referenced matter on Wednesday,
17 October 21, 1998, commencing at 9 a.m. in the
18 hearing room of the Alabama Public Service
19 Commission, the RSA Union Building, 100 North
20 Union Street, Room 904, Montgomery, Alabama,
21 before Kimberly L. Borders, Certified Court
22 Reporter and Notary Public in and for the
23 State of Alabama at Large.

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EXHIBIT

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1 that AT&T wishes to move
2 for the admission, which
3 is the excerpt from the
4 FCC's MPRM. Any
5 objection to that
6 admission?

7 (No response.)

8 JUDGE GARNER: It is so
9 admitted.

10 Mr. Campen.

11 MR. CAMPEN: Thank you, Your
12 Honor.

13 Q. (By Mr. Campen): Good afternoon, Mr.
14 Stacy.

15 A. Good afternoon.

16 Q. I want to focus now on check list Item 1,
17 Interconnection. Would you explain to the
18 Court your understanding of BellSouth's
19 obligation to CLECs, under this provision
20 of the Act, check list
21 Item 1?

22 A. The general provision of the Act requires
23 that we provide interconnection equal in

1 not fundamental to the check list,
2 particularly.

3 Q. I understand. I accept that
4 clarification. I want to direct your
5 attention -- if you still have the second
6 Louisiana decision handy, I want to direct
7 your attention to paragraph 77 of that
8 order.

9 A. Yes.

10 Q. The FCC concludes in this paragraph that,
11 I quote, in the first sentence,
12 BellSouth's performance data did not
13 demonstrate the service that BellSouth
14 provides to competitive LECs is equal in
15 quality to the service that BellSouth
16 provides for itself, close quote; is that
17 correct?

18 A. That's correct. That is what it says. I
19 obviously disagree with the FCC on their
20 interpretation of the data we furnished.

21 Q. Would you read the second and third
22 sentences of paragraph 77, beginning with
23 the words, for the months? See the second

1 and third sentence?

2 A. Yes. I am sorry. For the months of
3 March, April, and May 1998, BellSouth's
4 performance measurements seem to indicate
5 that trunk blockage on trunk provisioning
6 to competitive LECs was worse than for
7 BellSouth's retail trunks. A review of
8 BellSouth's performance measurements for
9 trunk blockage during busy hours revealed
10 a difference of seven-tenths percentage
11 points for May, 1.8 percentage points for
12 April, and 1.8 percentage points for
13 March, in favor of BellSouth.

14 Q. And there is a footnote at the end of that
15 sentence, is there not?

16 A. Yes, there is. Footnote 217.

17 Q. And in that footnote, the FCC explains,
18 does it not, how they derived the numbers
19 for the difference in blocking experienced
20 by BellSouth and CLECs?

21 A. Yes, they do. And it is a completely
22 incorrect manner to derive what the effect
23 on the customer is of trunk blockage. But

1 they do explain how they did it.

2 Q. Why don't you read that to us?

3 A. Footnote 217: BellSouth states in the
4 performance affidavit, Exhibit WNS-3,
5 report comparative trunk group service
6 summary. The percentage difference is
7 calculated by subtracting the percentage
8 of CLEC aggregate trunk groups blocked
9 from BellSouth's percent of BST local
10 trunk groups blocked. Thus, for example,
11 BellSouth's local trunks, 116 of 4,429
12 trunk groups, 2.6 percent, exceeded the
13 3-percent threshold; whereas, 26 out of
14 591, or 4.4 percent, competitive LEC trunk
15 groups experience blockage in excess of
16 3 percent, resulting in a difference of
17 1.8 percentage points.

18 MR. CAMPEN: I would like to
19 pass out, with the
20 Court's permission, two
21 exhibits, which I would
22 ask Your Honor that they
23 be marked for

1 identification as ICG
2 Exhibit 1, and that is
3 also marked as Table 1;
4 and ICG Exhibit 2, which
5 is a BellSouth report.

6 JUDGE GARNER: The documents
7 will be so marked.

8 (ICG Exhibit Nos. 1
9 and 2 were marked.)

10 Q. And the BellSouth report is BellSouth
11 trunk group service report for April 1998.
12 And, Mr. Stacy, I would represent to you
13 that this report was taken from
14 BellSouth's filing in a recent Kentucky
15 Section 271 proceeding. But I ask you to
16 accept, subject to check, that it is a
17 complete and accurate copy.

18 A. Subject to check, yes.

19 Q. Now, in Table 1, ICG Exhibit 1, ICG has
20 attempted to reproduce the analysis
21 described by the FCC in footnote 217 of
22 the second Louisiana order using the
23 source data from BellSouth. Now, I want

1 to explain how the table was constructed,
2 first. And then, I would like to ask you,
3 Mr. Stacy, if the table is indeed an
4 accurate reproduction of the analysis in
5 footnote 217.

6 First, I would like to direct your
7 attention to the top part of ICG Exhibit
8 1. You need to look at both of these
9 exhibits interchangeably for a few
10 moments.

11 The number of total BellSouth local trunks
12 given in footnote 217 is 4,429; is that
13 correct?

14 A. Yes, it is.

15 Q. And that is the number included on
16 BellSouth's April trunk service report,
17 ICG Exhibit 2, as the region total for the
18 BellSouth local network trunk groups
19 measured; is that correct?

20 A. That's correct.

21 Q. In turn, that number is shown on ICG
22 Exhibit 1; is that correct?

23 A. That is correct.

- 1 Q. The number of BellSouth local trunks
2 blocked given in the footnote, 217, is
3 116; is that correct?
- 4 A. Yes, it is.
- 5 Q. And that is the number included at the
6 bottom of BellSouth's April trunk group
7 service report under the BellSouth local
8 network region-wide total?
- 9 A. That's correct.
- 10 Q. In turn, do you see that same number on
11 ICG Exhibit 1, under groups greater than
12 3-percent blocking with the BellSouth
13 local network?
- 14 A. Yes.
- 15 Q. Likewise, the numbers in the footnote,
16 217, regarding CLEC aggregate trunk groups
17 blocked, 26 of the total of 591 are the
18 same as those contained in BellSouth's
19 April trunk group service report to the
20 right of the region-wide total CLEC
21 aggregate; is that correct?
- 22 A. That's correct.
- 23 Q. And are the numbers, in turn, correctly

1 reflected on ICG Exhibit 1?

2 A. Yes, they are.

3 Q. Look back at footnote 217. In the
4 footnote, the FCC calculates a percentage
5 figure for these numbers. In the --

6 A. I'm sorry. Yes, they do.

7 Q. In the case of CLEC trunk groups blocked,
8 the 4.4 percent figure was calculated by
9 dividing 26 by 591; is that correct?

10 A. That's correct.

11 Q. This is the high math that I was talking
12 about earlier. The 2.6 percent figure was
13 calculated in the same manner; correct?

14 A. Yes. That's correct.

15 Q. And would you agree that these
16 calculations, in turn, are directly
17 reflected on ICG Exhibit 1?

18 A. Yes.

19 Q. Now, turn back to the second Louisiana
20 decision for a moment and read the fourth
21 sentence in paragraph 77, which begins
22 with the words, although the.

23 A. I'm sorry. The fourth sentence?

1 Q. Beginning with the word, although. I may
2 have counted the sentences wrong,
3 paragraph 77.

4 A. I'm sorry. There it is. Although the
5 differences in percent of trunk blockage
6 appear relatively small, a more detailed
7 examination of the data indicates that
8 competitive LECs experience approximately
9 twice as many incidents of trunk blockage
10 as BellSouth's retail customers.

11 Q. Again, this sentence refers to another
12 footnote, does it not?

13 A. Yes. It refers to footnote 218.

14 Q. Again, would you mind reading that
15 footnote for the Court?

16 A. Footnote 218 says, the calculation of
17 competitive LECs experience trunk blockage
18 54.5 percent for March, 69.2 percent for
19 April and 38.8 percent for May, greater
20 than BellSouth's retail customers, is
21 derived by dividing the percentage of
22 competitive LEC trunk groups blocked by
23 the percentage of BellSouth's retail trunk

1 groups blocked. Thus, for example, in
2 period from March 23rd, 1998 to April
3 24th, 1998, competitive LECs' trunk groups
4 experienced blockage of 4.4 percent;
5 whereas, BellSouth's trunk groups
6 experienced blockage of 2.6 percent. The
7 competitive LECs' trunk blockage
8 percentage was 69.2 percent greater than
9 BellSouth's retail trunk groups.

10 Q. Now, if you will turn your attention back
11 to ICG Exhibit 1, Mr. Stacy, and look at
12 the middle of the page at the numbers to
13 the right of the percent difference.
14 Would you agree that this section of the
15 exhibit accurately reflects the
16 calculation by which the FCC derived 69.2
17 percent, which you just read from footnote
18 218?

19 A. Yes. I agree that this is the FCC's
20 method of calculation.

21 Q. That is what I asked.

22 A. I will explain their error to you in a
23 moment.

- 1 Q. Thank you. I knew you would. Isn't it
2 correct that the FCC describes the 69.2
3 percent figure as the degree by which CLEC
4 trunk blockage exceeded trunk blockage on
5 BellSouth's retail trunk groups for the
6 month of April 1998?
- 7 A. That is indeed how they described it.
8 Although, they are wrong.
- 9 Q. I understand your position. The FCC
10 computed the same statistic, did it not,
11 for the months of March and May? And
12 those numbers are included in the first
13 set of footnotes, aren't they?
- 14 A. Yes, they did. And they are.
- 15 Q. And are the numbers in that sentence
16 accurately reproduced on the bottom of ICG
17 Exhibit 1?
- 18 A. Yes, they are.
- 19 Q. Does the average of 54 percent, calculated
20 at the bottom of that exhibit, for the
21 three-month period, appear correct to you?
- 22 A. If you average percentages. That is an
23 improper method of calculating that. But

1 the math is correct.

2 Q. The math is correct. And these are the
3 numbers that the FCC included in their
4 footnote?

5 A. Yes.

6 Q. And was this, in turn, the basis of the
7 FCC's conclusion that you just read, that
8 although the differences in the percentage
9 of trunk blockage appear relatively small,
10 a more detailed examination of the data
11 indicates that competitive LECs
12 experienced approximately twice as many
13 incidents of trunk blockage as BellSouth's
14 retail customers?

15 A. Yes. And let me explain. Are we through
16 going through your example?

17 Q. Yes, sir.

18 A. The FCC's analysis, while accurate
19 mathematically, includes the trunk groups
20 that come from the CLECs switch to
21 BellSouth, over which BellSouth
22 exercises no administrative control.
23 And the whole calculation is completely

1 flawed from the bottom up, as I pointed
2 out to the staff when they talked about
3 it originally. If you look at the
4 datasheet that you have given me for
5 March with the state of Louisiana, there
6 were zero trunk groups blocked out of
7 six. Yet, they have reflected a
8 blockage for the CLECs of 4.4 percent in
9 that month by definitive calculation.
10 The actual blocked trunks for CLECs that
11 BellSouth controls, which is the
12 BellSouth administered group for Louisiana
13 for that month, was zero. For the
14 region, that was a total of eight. So
15 their method of calculation, as I
16 explained to the staff for two hours one
17 day, is completely wrong. They're
18 including things that BellSouth does not
19 control in their method of analysis.

20 MR. CAMPEN: Thank you. Your
21 Honor, we move to the
22 introduction of Exhibits
23 1 and 2 at this time.

1 JUDGE GARNER: Any

2 objections?

3 MR. ALEXANDER: No objection.

4 JUDGE GARNER: The documents
5 are so entered.

6 Q. In BellSouth's October 15th finding in
7 this document, it concluded in its service
8 quality measurements of trunk group
9 performance data for four months, June
10 through September of this year; is that
11 correct?

12 A. Yes.

13 Q. For ease of reference, I have made copies
14 of certain portions of the SQM. And I
15 would ask Mr. Gentle to hand this out
16 just to make it easier for everyone who
17 wants to follow along. And if you
18 will just take a moment to study and
19 to review those and to satisfy yourself
20 they are the correct pages.

21 A. Yes.

22 Q. Okay.

23 MR. CAMPEN: And Mr. Gentle, I

1 have another exhibit I
2 would ask you to pass out
3 as well. We also ask,
4 your honor, that this
5 next exhibit be marked as
6 ICG Exhibit 3 for
7 identification.

8 JUDGE GARNER: The document
9 will be so marked.
10 (ICG Exhibit 3 was
11 marked.)

12 Q. Mr. Stacy, this table that was just handed
13 out to you on the legal size sheet of
14 paper -- I will let you finish.

15 A. Okay.

16 Q. The table that was just handed out is ICG
17 Exhibit 3. And it was designed to
18 reproduce for the June September trunk
19 data, a portion of the analysis the FCC
20 prescribed in paragraph 77 of its second
21 Louisiana decision for BellSouth's April
22 1998 trunk data of which we just reviewed.
23 I do not intend to go through all four

1 months, in the interest of time, but I
2 wanted to ensure that ICG has correctly
3 replicated the analysis used by the FCC --
4 I realize you believe it is. And then I
5 will ask you some questions toward that
6 end.

7 A. Okay.

8 Q. I would ask you to first direct your
9 attention to the June trunk group service
10 report and refer to that as I go through
11 the numbers on the exhibit. Do you see
12 the number 146 on the sheet there, next to
13 BST administered, under CLEC aggregate?

14 A. Yes.

15 Q. And is that number the number of
16 region-wide Bellsouth administered CLEC
17 trunk groups shown on BellSouth's June
18 trunk group service report?

19 A. It is.

20 Q. And is that number correctly reflected on
21 the exhibit, Exhibit 3?

22 A. Yes.

23 Q. And is 600 the correct number for CLEC

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1 administered trunks under the CLEC
2 aggregate section of BellSouth's June
3 report?

4 A. Yes, it is.

5 Q. Is 3,879 the correct number of the total
6 BellSouth local network trunks for
7 the June trunk report?

8 A. Yes, it is.

9 Q. And are these numbers correctly reflected
10 on ICG Exhibit 3?

11 A. Yes, they are.

12 Q. With respect to the number in the June
13 percentage column to the right of total
14 CLEC, would you accept, subject to check,
15 that 22 divided by 746 was 2.9?

16 A. Subject to check, yes.

17 Q. And likewise, would you accept, subject to
18 check, that the math used to derive the
19 1.5 percent number in the June percentage
20 column to the right of BST local is
21 correct?

22 A. Yes, subject to check. It appears to be
23 correct.

1 Q. These numbers express the percentage of
2 the measured trunk groups experiencing
3 blocking greater than 3 percent in
4 BellSouth local trunks for June 1998; is
5 that correct?

6 A. Yes, they do.

7 Q. And this is the same method employed in
8 the ICG Exhibit 1 and by the FCC in
9 footnote 217 for the second Louisiana
10 decision?

11 A. Yes, it is.

12 Q. Do you see the number 1.4 to the right of
13 the word "difference" here at the bottom
14 of ICG Exhibit 3?

15 A. Yes, I do.

16 Q. And that is the difference between the
17 percentage blocking figures, 2.9 minus
18 1.5 I have just reviewed, isn't it?

19 A. Yes, it is.

20 Q. And what we have just reviewed in
21 respect to BellSouth's June trunk
22 performance data is the same analysis we
23 reviewed earlier with BellSouth's

1 region-wide April trunk performance data,
2 is it not?

3 A. That is correct.

4 Q. And you agreed that that analysis was
5 an accurate reproduction of what the SEC
6 did in footnotes 217 and 218, I believe?

7 A. Yes, I did.

8 Q. In the interest of time, I would ask you
9 to accept, subject to check, that the
10 numbers on Exhibit 3 for the months of
11 July through September also accurately
12 record the numbers on BellSouth's trunk
13 group service reports for those months as
14 filed in this document?

15 A. I will accept that, subject to check.
16 They appear to be in the right ranges.

17 Q. Thank you. I would also ask you to
18 accept, subject to check, the calculated
19 percentages for trunk groups blocked
20 difference in those percentages between
21 CLEC aggregate and BellSouth local are
22 correct.

23 A. Again, subject to check, I am willing to

1 accept that.

2 Q. I represent to you that they were
3 calculated in the same manner.

4 A. Okay.

5 MR. CAMPEN: Your honor, with
6 that, we will move into
7 evidence ICG Exhibit 3.

8 MR. ALEXANDER: No objection.

9 JUDGE GARNER: The document
10 is admitted.

11 Q. We have one final table that I would ask
12 Mr. Gentle to pass out.

13 JUDGE GARNER: Is this marked
14 as ICG 4?

15 MR. CAMPEN: Yes, your Honor.

16 JUDGE GARNER: It will be so
17 marked.

18 (ICG Exhibit 4 was
19 marked.)

20 Q. Mr. Stacy, this exhibit is designed to
21 reproduce the remainder of the analysis
22 done by the FCC in footnotes 217 and 218,
23 respectively, trunk group performance data

1 and file definition to this reference.
2 And again, I will have to ask you some
3 questions about it to see if the exhibit
4 does this accurately. First, look at the
5 numbers at the top of the page for
6 percentage CLEC trunks blocked and
7 percentage of BellSouth local trunks
8 blocked and the difference between the
9 two. And I will ask you if these are the
10 same numbers that are reflected on Exhibit
11 3?

12 A. Yes, they are.

13 Q. At the middle part of the exhibit, this
14 is the portion of the exhibit intended to
15 reproduce the months of June through
16 September using the FCC methodology we
17 discussed, the percentage by which CLEC
18 trunk blockage exceeded blocking on
19 BellSouth local trunk groups. Again, I
20 want to make sure that the numbers are
21 computed in the same manner that the FCC
22 used in footnote 218 of the second
23 Louisiana decision. Does providing the

1 number 1.4 -- 1.5 as shown on the exhibit
2 -- strike that. Does dividing the 1.4
3 percent figure shown on this exhibit by
4 the percentage BST local trunks blocked of
5 1.5 percent accurately replicate the
6 method used by the FCC in 218? And there
7 the number calculated was 69.2 percent,
8 that is the correlative number?

9 A. Yes. It replicates their method.

10 Q. And likewise, would you agree that
11 dividing the number shown on this portion
12 of the table for July through September
13 would, with equal accuracy, replicate
14 the methods used by the FCC in footnote
15 218 of the second Louisiana decision?

16 A. Again, subject to check. I have no
17 reason to believe that the numbers are
18 inaccurate.

19 Q. The last section on this exhibit, ICG
20 Exhibit 4, is a calculation of the average
21 of the four months. Would you accept,
22 subject to check, that the sum of these
23 numbers is 192 and that the average of

1 those four numbers is 48?

2 A. Yes, subject to check.

3 Q. In footnote 218 of the second
4 Louisiana decision, the FCC took the
5 numbers derived in this same manner and
6 averaged them, did they not? That is the
7 numbers for the March, April and May
8 period?

9 A. I don't believe they did in footnote 218.

10 Q. Let me clarify that. The calculation is
11 not included in footnote 218 but they
12 recite the monthly numbers, do they not?

13 A. Yes. They recite the monthly numbers.
14 They did not add the averages which
15 is --

16 Q. So we have established that in ICG Exhibit
17 1, the average for the months referenced
18 by the FCC in footnote 218 was 54 percent,
19 haven't we?

20 A. Again, the math is improper but the way
21 you did it, the math, is correct. You
22 can't add the averages when the averages
23 are based on different numbers and arrive

1 at an accurate result.

2 Q. But don't you mean that the math is
3 incorrect but the methodology, in your
4 opinion, is incorrect.

5 A. The -- yes. The math itself is correct.
6 The methodology of adding percentages and
7 dividing is incorrect.

8 Q. And isn't it true Mr. Stacy, if one
9 accepts the FCC's analysis and accurately
10 applies it to the BellSouth data on trunk
11 performance, in this document for the
12 months of June through September, the
13 results shown on ICG Exhibit 4 are near 48
14 percent, fully supports the FCC's
15 conclusion in paragraph 77 that
16 competitive LECs experienced approximately
17 twice as many incidents of trunk blockage
18 as BellSouth retail customers?

19 A. Yes. Which is exactly why I will ask the
20 Commission to follow me through about a
21 two-minute discussion of why this is
22 wrong. Let's go back to ICG Exhibit 3.
23 The BellSouth administered trunk groups

1 are those going -- and let's take the June
2 figures as an example. And I will try to
3 do the calculations accurately here
4 without a calculator.

5 Q. I will be happy to provide you with one.

6 A. Actually, I think I have one over here.
7 Let me get it. Let's talk about where
8 the FCC is wrong. The BellSouth
9 administered trunk groups are those for
10 which BellSouth bears responsibility. If
11 you measure the blockage rate on those
12 groups for the month, that is the only
13 element in that group that BellSouth
14 controls. The CLEC groups, and let's
15 take ICG for instance, comes from an ICG
16 switch to BellSouth. We don't order
17 them. We don't control the number of
18 them. We have nothing to do with them
19 accept providing trunk terminations on
20 our end. The sizing for the CLEC
21 administered groups is under the sole
22 discretion of ICG or the facility-based
23 CLEC. So that entire line has to be

1 eliminated from the calculation. Let's
2 redo the June calculation with that
3 correction. The percentage you will find
4 for BST administered groups blocked is
5 2.74 percent. If you compare that to the
6 BST local groups, the difference, then, in
7 that month is 1.2 percent. If you redo
8 that calculation across the whole group,
9 you find a vastly different set of
10 results. So first, the FCC's method of
11 calculation is wrong. Second, let's look
12 underneath that one layer and see what the
13 big flaw is. The flaw is that doing that
14 at the trunk group level completely
15 neglects to consider the size of these
16 trunk groups. There are trunk groups in
17 this report that have 24 trunk groups in
18 them. There are trunk groups in this
19 report that have 1,000 trunk groups in
20 them. So estimating the impact on the
21 customers from this blockage report is
22 exactly what you cannot do at this level.
23 You have to go down in the data one level,

Comparative Trunk Group Blockage Analysis

CLEC / BellSouth

April 1998*

	Total Trunk Groups	Gps >3% Blkg	%
% CLEC Trunks Groups Blocked	591	26	4.4
% BST Local Trunks Groups Blocked	<u>4429</u>	<u>116</u>	<u>2.6</u>
Net			1.8
% Difference		(1.8 / 2.6)	
		69.2%	

**Source: BellSouth Telecommunications, Inc. April Trunk Group Service Report and Application of BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc. for Provision of In-Region, InterLATA Services In Louisiana, CC Docket 98-121, Rel. October 13, 1998, footnote 18.*

EXHIBIT

3

Comparative Trunk Group Blockage Analysis

CLEC / BellSouth

April 1998

REVISED

	Total Trunk Groups	Gps >3% Blkg	%
% CLEC Trunks Groups Blocked	111	8	6.9
% BST Local Trunks Groups Blocked	<u>4429</u>	<u>116</u>	<u>2.6</u>
Net			4.3
% Difference		(4.3 / 2.6)	
		165%	

EXHIBIT

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